Michael W. Mitchell (MM 6310) John Boyle (JB 0136) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Four Times Square New York, New York 10022 (212) 735-3000 Attorneys for Plaintiff AL Solutions, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AL SOLUTIONS, INC.,

Plaintiff,

- against -

JAMEGY, INC. a/ka/ TITAN HOLDINGS, INC., JAMEGY WV, INC. a/ka TITAN HOLDINGS WV, INC.,

Defendants.

TO: Maxine Gail Sleeper Cooley Godward Kronish LLP 1114 Avenue of the Americas New York, NY 10036 (212) 479-6058 msleeper@cooley.com

> Hans Harris Chen Cooley Godward Kronish LLP

: 08 Civ. 5515 (CM)

MOTION TO REMAND

One Freedom Square Reston Town Center 11951 Freedom Drive Reston, VA 20190 (703) 456-8000 hchen@colley.com

-and-

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COUNSEL:

PLEASE TAKE NOTICE that Plaintiff AL Solutions, Inc., by and through its attorneys, Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York, 10036, shall and does hereby apply to the United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, NY, for an Order, pursuant to 28 U.S.C. § 1447(c), remanding this action to the State Court from which it was removed and an Order seeking a stay of discovery until Plaintiff's Motion to Remand is decided.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff relies on its accompanying Memorandum of Law, Declaration of John Boyle, and Proposed Order.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: July 8, 2008

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Attorneys for Plaintiff AL Solutions, Inc.

BY:

John Boyle (JB 0136)